EXHIBIT 59

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE)
COMMISSION,)
)
Plaintiff,)
) Case No.
vs.) 1:23-cv-1346 (JSR)
)
TERRAFORM LABS PTE LTD. and)
DO HYEONG KWON,)
)
Defendants.)
________________________________)

VIDEOTAPED DEPOSITION OF KANAV KARIYA
Chicago, Illinois
Friday, August 18, 2023
9:09 a.m. CST

Reported by:
Diana G. Rodriguez, CSR
JOB No. 230818TCE

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE)
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)
Defendants.)
________________________________)

Videotaped deposition of KANAV KARIYA taken on behalf of the Plaintiff at 175 West Jackson Boulevard, 14th Floor, Chicago, Illinois, beginning at 9:09 a.m. and ending at 12:09 p.m., on Friday, August 18, 20213, before Diana G. Rodriguez, Certified Shorthand Reporter No. 084-002945.

APPEARANCES:
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Also Present:

Certified Video Specialist Patrick McPherson

I N D E X
WITNESSES

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EXHIBITS

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For Plaintiff:		
Exhibit 1	Printout of Kanav Kirya LinkedIn page For Identification	13
Exhibit 2	TFL-SEC 173218 For Identification	19
Exhibit 3	TFL-SEC 173215-216 For Identification	22
Exhibit 4	SEC-JUMPTRADE-E 59-66 For Identification	26
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Exhibit 6	SEC-JUMPTRADE-E 4325-4326 For Identification	31
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answer the question at this time.
BY MS. STAREN:
Q Did you tell Do Kwon that Jump would agree to step up and help restore the peg by buying up UST?
MR. HENKIN: Same objections.
BY THE WITNESS:
A On the instruction of counsel I exercise my rights under the Fifth Amendment and decline to answer the question at this time.
BY MS. STAREN:
Q Did you tell Do Kwon that Jump would step in and help restore the peg if Do Kwon agreed to amend the LUNA loan agreement and lift the vesting conditions?
MR. HENKIN: Same objections.
BY THE WITNESS:
A On the instruction of counsel I exercise my rights under the Fifth Amendment and decline to answer the question at this time.
BY MS. STAREN:
Q And when you asked Do Kwon to lift the vesting conditions in exchange for Jump's agreement to buy up UST to restore the peg, Do Kwon agreed to that, correct?

MR. HENKIN: Same objection and assumes facts not in evidence.
MR. CLARK: Object to form.
BY THE WITNESS:
A On the instruction of counsel I exercise my rights under the Fifth Amendment and decline to answer the question at this time.
BY MS. STAREN:
Q And you reached this agreement with Do Kwon on the morning of May 23, 2021, correct?
MR. HENKIN: Object to form, foundation, assumes facts not in evidence and designation pursuant to paragraph 3 of the protective order.
MR. CLARK: Object to form.
BY THE WITNESS:
A On the instruction of counsel I exercise my rights under the Fifth Amendment and decline to answer the question at this time.
BY MS STAREN:
Q Okay. I'm going to play a video for you which is going to be marked as Exhibit 17A. And I can -- Mr. Kariya, you told Do Kwon that Jump would step in and help restore UST's peg if Do Kwon agreed to amend the LUNA loan agreement and lift the vesting conditions, correct?

MR. HENKIN: Object to form, foundation, assumes facts not in evidence, paragraph 3 of the protective order.
MR. CLARK: Object to form.
BY THE WITNESS:
A On the instruction of counsel I exercise my rights under the Fifth Amendment and decline to answer the question at this time.
(Exhibits 17A and 17B marked for identification)
MS. STAREN: So I'm going to hand you two documents. The first just represents the Bates number of the video file that I will be playing that is Exhibit 17A and -- the cover sheet represents 17A, which is the Bates number of the video file, the screenshot is 17B.
(Video played)
BY MS. STAREN:
Q Mr. Kariya, do you recognize the video that is Exhibit 17A that we just played?
A On the instruction of counsel I exercise my rights under the Fifth Amendment and decline to answer the question at this time.
Q Was that a video of you scrolling through your phone?

MR. HENKIN: Object to form.
BY THE WITNESS:
A On the instruction of counsel I exercise my rights under the Fifth Amendment and decline to answer the question at this time.
BY MS. STAREN:
Q And what was being depicted on the screen of your phone in that video?
MR. CLARK: Object to form.
BY THE WITNESS:
A On the instruction of counsel I exercise my rights under the Fifth Amendment and decline to answer the question at this time.
BY MS. STAREN:
Q The screen of your phone was reflecting a series of communications between yourself and Do Kwon, correct?
MR. HENKIN: Object to form, lack of foundation.
BY THE WITNESS:
A On the instruction of counsel I exercise my rights under the Fifth Amendment and decline to answer the question at this time.
BY MS. STAREN:
Q Were these Signal communications?